

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

September 5, 2003

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T.R.A. DOCKET ROOM

IN RE: Petition for Exemption of Certain )  
Services ) Docket No. 03-00391  
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PETITION TO INTERVENE

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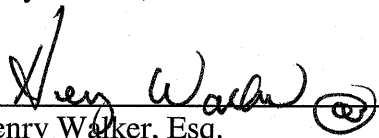
The Southeastern Competitive Carriers Association ("SECCA") petitions the Tennessee Regulatory Authority (the "Authority") to intervene in the above-captioned proceeding.

This matter is before the agency upon the filing of a Petition for Exemption of certain services filed by BellSouth Telecommunications Inc. ("BellSouth") and Citizens Communications, Inc. ("Citizens"). The petition requests the TRA to exempt certain services from regulatory requirements pursuant to T.C.A. § 65-5-208. Specifically, the Petitioners requested exemption from regulation of IntraLata toll service and Primary Rate ISDN service.

As an association of competing local exchange carriers operating in Tennessee, the legal rights, duties, privileges, immunities, or other legal interests or responsibilities of SECCA's members may be affected or determined by the outcome of this proceeding. Furthermore, granting this petition will not impair the orderly and prompt conduct of these proceedings.

SECCA therefore requests that this Petition to Intervene be granted.

Respectfully submitted this 5th day of June, 2003.

  
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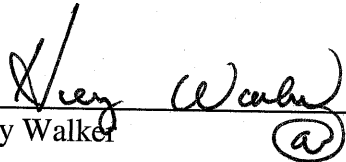
**CERTIFICATE OF SERVICE**

This is to certify that I have this day caused to be served by United States mail a copy of the within and foregoing Petition to Intervene upon the following person, properly addressed as follows:

Guy M. Hicks  
333 Commerce Street, Suite 2101  
Nashville, TN 37201-3300

Guifford F. Thornton, Jr.  
424 Church Street, Suite 2800  
Nashville, Tennessee 37219-2386

This 5th day of September, 2003.

  
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Henry Walker